

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	Civil Action No.
v.	:	3:16-CV-622-CWR-FKB
STATE OF MISSISSIPPI,	:	
	:	
Defendant.	:	

UNITED STATES’ MOTION FOR ENTRY OF A CASE MANAGEMENT ORDER

The United States respectfully moves the Court for entry of a Case Management Order permitting each Party to propound 150 Rule 34 Requests for the Production of Documents (“RPDs”) and 45 Rule 36 Requests for Admissions (“RFAs”).

1. This case seeks to remedy widespread and ongoing civil rights violations by the State of Mississippi. Thousands of adults with mental illness in the State are institutionalized in one of the State’s costly State Hospitals each year, though many could be served through community-based services if the State’s policies, practices, and funding decisions did not privilege hospitalization.

2. The Court should set limits on discovery based on the particular needs of each case. L.U.Civ.R. 26(d).

3. In this case, 150 RPDs and 45 RFAs are appropriate given the scope and complexity of the system at issue and the ongoing civil rights violations occurring in the State.

4. Allowing 150 RPDs and 45 RFAs is consistent with the discovery in similar litigation in other states.

5. For support, the United States attaches the exhibits listed below and files a Memorandum of Authorities in Support of this Motion:

Exhibit A – Proposed Case Management Order

Exhibit B – Joint Stipulation Regarding Discovery

6. The United States respectfully requests that the Court enter a Case Management Order permitting each party to propound 150 RPDs and 45 RFAs.

Respectfully submitted,

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Date: May 26, 2017

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CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2017, I electronically filed the foregoing with the Clerk of Court using the ECF system, which sent notification of such filing to all counsel of record.

/s/ Mathew Schutzer
Mathew Schutzer (NY Bar #5136007)